

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re:

CITY OF DETROIT, MICHIGAN,

Chapter 9

Debtor,

Case #: 13-53846

Hon. Steven W. Rhodes

**PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF  
OF CLAIM #1132**

**NOW COMES** Plaintiff's Counsel, **CHRISTOPHER TRAINOR & ASSOCIATES**, and requests that this Honorable Court enter an Order allowing Plaintiff's Counsel to withdraw as counsel for Plaintiff for the following reasons:

1. That this case was filed on January 16, 2012, arising out of an incident which occurred on January 16, 2009, between the City of Detroit and Dwight Miller.
2. There has been a complete and total breakdown of the attorney-client relationship to the extent that it has impaired Plaintiff's Counsel's ability to properly represent Plaintiff and to adequately prepare his case for trial.
3. Based upon the foregoing, Plaintiff's Counsel absolutely cannot continue as attorneys for Plaintiff pursuant to Michigan Rule of Professional Conduct 1.16.
4. Petitioner, Christopher Trainor filed Proof of Claim number 1132 in this matter.
5. Petitioner, Christopher Trainor is requesting to withdraw as counsel as to Proof of Claim number 1132 and as to the entire matter in the Eastern District of Michigan Southern Division.

**WHEREFORE**, Petitioner CHRISTOPHER TRAINOR & ASSOCIATES hereby respectfully requests that this Honorable Court enter an order allowing them to withdraw as counsel for Plaintiff.

Respectfully Submitted,  
CHRISTOPHER TRAINOR & ASSOCIATES

  
CHRISTOPHER J. TRAINOR (P42449)  
AMY J. DEROUIN (P70514)  
Attorneys for Plaintiff  
9750 Highland Road  
White Lake, MI 48386  
(248) 886-8650  
[shanna.suver@cjtrainor.com](mailto:shanna.suver@cjtrainor.com)

Dated: August 25, 2014  
*CJT/vjc*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re:

CITY OF DETROIT, MICHIGAN,

Chapter 9

Debtor,

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/

**ORDER GRANTING PETITIONER, CHRISTOPHER TRAINOR'S MOTION TO  
WITHDRAW FROM PROOF OF CLAIM #1132**

Upon consideration of the motion of Petitioner, Christopher Trainor

IT IS hereby ORDERED that the Christopher Trainor is Withdrawn as Counsel for Dwight Miller as his representation relates to Proof of Claim #1132 and as to the case filed in the Eastern District of Michigan, Southern Division

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN ~~FILED~~  
SOUTHERN DIVISION

2014 SEP -5 AM 09:12

*CR*

2014 SEP -2 PM 2:45

In Re:

CITY OF DETROIT, MICHIGAN,

Debtor,

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN

J.S. BANCROFT, CLERK  
E.D. Chapter 9, U.S. BANK

Case #: 13-53846

Hon. Steven W. Rhodes

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**PLEASE TAKE NOTICE** that on September 2, 2014, Petitioner Christopher Trainor, filed the *PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF OF CLAIM #1132* in the United States Bankruptcy Court for the Eastern District of Michigan seeking entry withdrawal as Counsel for Dwight Miller as to Proof of Claim #1132.

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Motion or you want the Bankruptcy Court to consider your views on the Motion, by **September 16, 2014**, you or your attorney must:

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>1</sup>

United States Bankruptcy Court  
211 West Fort Street  
Detroit, MI 48226

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A response must comply with F. R. Civ. P. 8(b), (c) and (e).

You must also serve a copy of any objection or response upon:

CHRISTOPHER TRAINOR & ASSOCIATES  
9750 Highland Road  
White Lake, MI 48386  
Phone: (248) 886-8650  
Fax: (248) 689-3321

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

**PLEASE TAKE FURTHER NOTICE** that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

  
CHRISTOPHER J. TRAINOR (P42449)  
Christopher Trainor & Associates  
9750 Highland Road  
White Lake, MI 48386  
Phone: (248) 886-8650  
[shanna.suver@cjtrainor.com](mailto:shanna.suver@cjtrainor.com)

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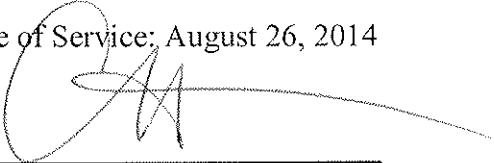
CERTIFICATE OF SERVICE

The undersigned certifies that he caused the following document to be served as follows:

Document Served: *PLAINTIFF COUNSEL'S MOTION TO WITHDRAW AS COUNSEL AS TO PROOF OF CLAIM #1132*

Method of Service: Via First Class mail to Dwight Miller 1390 Stamford Rd., Ypsilanti, Michigan 48198

Date of Service: August 26, 2014

  
CHRISTOPHER J. TRAINOR (P42449)  
Christopher Trainor & Associates  
9750 Highland Road  
White Lake, MI 48386  
Phone: (248) 886-8650  
[shanna.suver@cjtrainor.com](mailto:shanna.suver@cjtrainor.com)

2014 SEP - 29 PM 4:19  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION  
DETROIT, MICHIGAN